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Plaintiff 2-Way Computing, Inc. ("2-Way") hereby files this Unopposed Motion and [Proposed] Order to Extend Deadline for Defendants Mitel Networks Corporation and Mitel (Delaware), Inc. (collectively, "Mitel") to Respond To Complaint. This request complies with Local Rules ("LR") 6-1, 6-2, and 7-1. The litigation of this matter will be best served by the proposed extension. This is the second request to extend the response deadline. This request is not made after the response deadline.

The Complaint [Doc. No. 1] was filed on November 25, 2015. Mitel (Delaware), Inc. was served with the summons and complaint on February 23, 2016, and Mitel Networks Corporation waived service as part of the previous extension request. The Court previously granted an extension request, which set the deadline for Mitel to answer for May 16, 2016.

Pursuant to discussions between 2-Way and Mitel, both parties are agreeable to an extension of time for Mitel to further investigate the allegations of the Complaint. 2-Way agrees to extend the deadline for Mitel to respond to the Complaint for an additional fifteen (15) days, until May 31, 2016. Because an attorney for Mitel has not made an appearance in the case yet, 2-Way files this motion to extend Mitel's deadline as an unopposed motion.

Accordingly, Plaintiff respectfully request that the Court grant this request to continue the deadline for Defendants to respond to the Complaint.

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DATED: May 13, 2016

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Respectfully submitted,

RUSS, AUGUST & KABAT

By: /s/ C. Jay Chung

RUSS, AUGUST & KABAT Reza Mirzaie (Admitted Pro Hac Vice) C. Jay Chung (Admitted Pro Hac Vice) 12424 Wilshire Boulevard, Twelfth Floor Los Angeles, California 90025 Telephone: (310) 826-7474 Facsimile: (310) 826-6991 rmirzaie@raklaw.com jchung@raklaw.com

Mark Borghese Nevada Bar No. 6231

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CERTIFICATE OF SERVICE

The	undersigned h	ereby certifies the	at a true copy or	f the foregoing	document h	as been
served on M	Tay 13, 2016 to	all counsel of re	ecord via the Co	ourt's CM/ECF	system.	

Dated: May 13, 2016 /s/ C. Jay Chung